REMARKS

Claims 1-22 are all the pending claims in the application. Claims 1-22 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2003/0093610 A1 (hereinafter "Lai"). Applicant respectfully submits that the rejection is believed to be improper and submits the following in traversal thereof.

Applicant submits that claim 1 is believed to be patentable because the Office Action fails to show how each and every element of the claim is disclosed or suggested by Lai. In response to our previous arguments, the Office Action still fails to point out how Lai discloses the claimed first and third mapping tables.

Independent claim 1 requires first, second and third mapping tables. Assuming *arguendo*, that Fig. 2B of Lai discloses two tables, Applicant submits that the entire Lai reference essentially discloses only two mapping tables, as shown in Fig. 2B.

Lai discloses a host computer 49 connected to a control device 40, which is, in turn, connected to flash memories 31-39. The control device 40 includes an N-th buffer 419 which stores a mapping table 419 (Fig. 2B) which maps the logical block addresses (LBA) to the physical block addresses (PBA) of the flash memory 31. The flash memory 31 stores for each PBA, a corresponding data value. Lai, however, still fails to disclose a third mapping table.

Rather, Lai discloses that an updated mapping table 419 is stored both in the N-th buffer 419 and in the special reserved block of mapping update. Paragraph 24. In other words, there is no minimizing of an update operation of the second mapping table, as recited in claim 1 because any changes to the mapping table 419 is reflected in the copy of the mapping table 419 in the N-th buffer and in the copy of the mapping table 419 stored in the special reserved block.

As a consequence of storing the updated mapping table 419 in the special reserved block of the flash memory in Lai, the host computer can store the updated mapping table 419 in the flash memory into the mapping buffer memory in the control device 40 when the host computer is turned on, instead of having to having to build an entirely new mapping table. Paragraphs 24 and 29.

This is entirely different from the claimed invention, which requires a third mapping table in which most recent mapping information is written and processed by a specified value to minimize an update operation of the second mapping table. In contrast, Lai discloses the constant updating of the mapping table 419 in the buffer memory 419 and in the special reserved block. Therefore, there is no third mapping table.

As for the Examiner's comments that Lai discloses a first, second and up to Nth buffer that each have their own mapping table, such buffers cannot correspond to the claimed first, second and third mapping tables given the claimed relationships which exist between the claimed mapping tables. In contrast, no such relationship exists between the mapping tables in the first, second and up to Nth buffers of Lai.

Applicant respectfully requests the Examiner to specifically address how claims 20-22 are allegedly disclosed by Lai. For example, nowhere does Lai teach or suggest a fourth mapping table as recited in claims 21 and 22.

For at least the above reasons and for the reasons submitted in the Amendment of January 25, 2006, claim 1 is believed to be patentable.

For reasons similar to those submitted for claim 1, claims 4 and 6 are believed to be patentable.

The remaining dependent claims are believed to be patentable for at least the reasons submitted for their respective base claims.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

Seok-Won Stuart Lee
Limited Recognition No. L0212

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860

WASHINGTON OFFICE
23373
CUSTOMER NUMBER

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